Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	MB Docket No. 05-312
Digital Television Distributed	)	
Transmission System Technologies	)	

Reply Comments of
Cohen, Dippell and Everist, P.C.

The following reply comments are respectfully submitted by the consulting engineering firm of Cohen, Dippell and Everist, P.C. ("CDE") concerning MB Docket No. 05-312 and the "Clarification Order and Notice of Proposed Rulemaking", FCC 05-192, released November 4, 2005 [CO & NPRM]. CDE or its predecessors have been providing consulting engineering services to the broadcast industry for over 60 years.

Comments offered by Merrill Weiss Group, LLC, Coalition for DTS, Pennsylvania State University, The Association for Maximum Service Television, Inc. and National Association of Broadcasters are excellent comments both technically and legally and generally support the concept of Distributed Transmission Systems.

These reply comments only desire to focus on the technical nature of the proposal. In the comments filed in this proceeding on February 6, 2006, CDE suggested the conservative approach of arithmetically summing the undesired field strengths from multiple DTS transmitters when calculating co-channel interference to desired stations. After further discussion and consideration, CDE proposes the use of the root-sum-square ("RSS") method of summing undesired contributions for all channel relationships, co-channel as well as adjacent. Properly defined variable D/U ratios

and the use of (50,10) propagation parameters for the undesired signal ensures adequate conservatism in protecting co-channel stations.

As indicated by the Merrill Weiss Group, LLC, CDE agrees that it is only a "tool that can be applied by broadcaster to overcome a variety of transmission difficulties."[1] The Association for Maximum Service Television, Inc. makes reference to some of the technical issues such as field strength aggregation, variable protection ratios into OET-69 methodology and incorporate existing Part 73 parameters concerning power, antenna height, etc.[2]

All these issues are salient and particularly if implemented in OET-69 methodology, careful consideration must be given to ensure that the program faithfully provides realistic results. However, CDE reaffirms that the distributed transmission system is only a tool and not a panacea. It is unknown how these systems, when in place in a variety of terrain conditions, will react to changing environmental conditions such as wind, fog, etc. and how the stability of this sophisticated technology will change the resultant interference when more than one propagation path is involved.

Respectfully Submitted,

Donald G. Everist

DATE: March 7, 2006

[1]See Page 2 of the Comments of the Merrill Weiss Group, LLC.

[2]See Sections IIB and IIC of the Comments by The Association for Maximum Service Television, Inc.